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August 22, 2019

**BY FAX and ECF**

Honorable James Orenstein  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

Re: Clarke v. N.Y.C. Dep't of Educ., et al.  
Civ. Action No. 18 Civ. 1850 (NGG) (JO)  
Request for Extension of Time to File Plaintiff's Response to Defendants'  
Motion for Summary Judgment

Dear Judge Orenstein:

I am the attorney for Plaintiff in the above-referenced matter. I write to request an extension of time to file Plaintiff's Response to Defendants' Motion for Summary Judgment from August 30, 2019 to September 13, 2019. The reason for this request is that we require time to secure declarations from necessary witnesses as well as review the record. Additionally, we did not receive copies of Defendants' motion papers and support exhibits until several days after they were filed. This is the third request for an extension of time regarding this motion; the first request made by Defendants was terminated as moot and Defendants' second request was granted. This is Plaintiff's first request for an extension of time.

I have spoken with Defendant's attorney and she consents to this adjournment request. The new proposed date for the filing of Defendants' Reply and the new return date would be September 27, 2019.

Thank you for your consideration of this request for an extension of time for Plaintiff to submit her response.

Respectfully submitted,

/s: *Jordan F. Harlow*

JORDAN HARLOW